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February 9, 2021

Via ECF

The Honorable John G. Koeltl
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007

Re: In re Application of Shervin Pishevar, 1:19-mc-00503-JGK-SDA

Dear Judge Koeltl:

We are counsel to the Petitioner Shervin Pishevar in the above-captioned matter. We write to respectfully request, with the consent of the Respondent Marcus Baram, that the Court adjourn the oral argument that is currently scheduled for February 19, 2021 pending the Petitioner's investigation of new information. This new information may obviate Petitioner's need for the present action. The Petitioner therefore respectfully requests an adjournment of the February 19, 2021 hearing until Petitioner's investigation into this new development is complete, including if necessary via a separate 1782 proceeding.

Pursuant to Your Honor's Individual Practices Section I.E, the Petitioner states further that:

1. Oral argument is currently set for February 19, 2021 at 11:00 AM.
2. The parties have previously submitted one request for adjournment, dated February 2, 2021 (requested by the Respondent with the Petitioner's consent). *See* ECF 102.
3. The Court granted the previous request for adjournment. *See* ECF 103.
4. The Respondent consents to the Petitioner's request for adjournment.

We are grateful to Your Honor's attention to this matter.

quinn emanuel urquhart & sullivan, llp

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Respectfully,

/s/ Lucas V. M. Bento

Lucas V. M. Bento

Cc: Megan H. Daneshrad, Esq. (Counsel for Respondent) (via ECF)
Toby Butterfield, Esq. (Counsel for Respondent) (via ECF)
Zaid Shukri, Esq. (Counsel for Respondent) (via ECF)